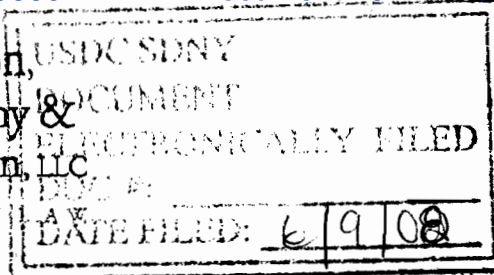




Lennon,
Murphy &
Lennon, LLC

ATTORNEYS AT LAW



The GrayBar Building
420 Lexington Ave., Suite 300
New York, NY 10170
phone (212) 490-6050
fax (212) 490-6070
www.lennonmur.com

Tide Mill Landing
2425 Post Rd. Suite 302
Southport, CT 06890
phone (203) 256-8660
fax (203) 256-8615
msl@lennonmur.com

June 9, 2008

Via Facsimile 212-805-7913

Hon. Peter K. Leisure
United States District Judge, Room 1910
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

Re: **Cantone & Co., Inc. v. Seafrigo a.k.a. Seafrigo Marseille**
Docket Number: No. 07 CV 6602 (PKL)
Our Reference Number: 1040-07

Dear Judge Leisure:

We represent the Plaintiff, Cantone & Co., Inc., in the above captioned matter admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure.

On May 22, 2008, Defendant Seafrigo a.k.a. Seafrigo Marseille (hereinafter "Defendant") filed a Notice of Motion to Vacate Plaintiff's Rule B Attachment, or to Reduce the Amount and Substitute a Bank Guarantee; and a Motion to Dismiss the Case on the Basis of a Mandatory and Exclusive Foreign Forum Selection Agreement. Plaintiff's opposition papers are currently due to be filed and served on counsel for Defendant by Monday, June 9, 2008.

We have conferred with Stephen H. Vengrow, of Cichanowicz, Callan, Keane, Vengrow & Textor, LLP, counsel for the Defendants, and write to request that Your Honor approve an agreed upon enlargement of time to the briefing schedule as follows:

- 1) Plaintiff to serve its papers in opposition to Defendant's Motion to Vacate or to Reduce the Amount and Substitute a Bank Guarantee; and Motion to Dismiss on or before **Tuesday, June 17, 2008**; and
- 2) Defendant to serve its reply papers on or before **Tuesday, June 24, 2008**.


This request is made on consent. No previous adjournments have been requested in this matter to date.

We note that Your Honor's individual practice rules require that this request be made five business days prior to the original deadline for service. We respectfully request that Your Honor allow this request and approve the parties' modification to the scheduling order.

As permitted by Courtroom Deputy Eileen Chan via telephone this morning, this letter is being sent via facsimile to Chambers. A copy was also hand delivered to Chambers via courier this morning. A copy of this letter is being sent via facsimile this morning to Defendant's counsel.

We thank Your Honor for your consideration of this request. Should Your Honor have any questions or comments we are available to discuss the same at any convenient time to the Court.

Respectfully submitted,


Anne C. LeVasseur

cc: Via Facsimile 212—344-7285
Stephen H. Vengrow
Counsel for Defendant

6/09/08

